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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master Case No. 07-05944-SC
MDL No. 1917

This Document Relates to:

*Office Depot Inc. v. Hitachi, Ltd., et al.,
Individual Case No. 11-cv-05514*

*Interbond Corporation of America d/b/a
BrandsMart USA v. Hitachi, Ltd., et al.,
Individual Case No. 11-cv-06275*

**DECLARATION OF STUART H.
SINGER IN SUPPORT OF
PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT
ON STATE LAW CLAIMS LIMITED
TO INTRASTATE ACTIVITY**

1 I, **STUART H. SINGER**, declare as follows:

2 1. I am a partner at the law firm of Boies, Schiller & Flexner LLP, counsel for
3 plaintiff Office Depot, Inc. ("Office Depot") and Interbond Corporation of America
4 ("Brandsmart"), and am licensed to practice law in the State of Florida and admitted to practice
5 *pro hac vice* before this Court. Except for those matters stated on information and belief, which I
6 believe to be true, I have personal knowledge of the facts stated herein, and, if called as a witness,
7 I could and would competently testify thereto.

8 2. Sometime in or about November 2007, the United States Department of Justice
9 began investigating certain foreign corporations for involvement in an overseas illegal cathode ray
10 tube ("CRT") price-fixing conspiracy, which impacted the prices paid by American businesses and
11 consumers from at least March 1, 1995 through at least November 25, 2007 (the "Relevant
12 Period"). Indirect Purchaser Plaintiff's Fourth Consolidated Am. Compl. ¶ 206.

13 3. Attached hereto as Exhibit A is a true and correct copy of excerpts from the
14 transcript of the deposition of Robert Randal Johnson, taken in Fort Lauderdale, Florida on August
15 8, 2014.

16 4. Attached hereto as Exhibit B is a true and correct copy of excerpts from the
17 transcript of the deposition of Angus Bryan, taken in Fort Lauderdale, Florida on August 7, 2014.

18 5. Attached hereto as Exhibit C is a true and correct copy of excerpts from the
19 transcript of the deposition of Lary Sinewitz, taken in Miami, Florida on February 6, 2014.

20 6. Attached hereto as Exhibit D is a true and correct copy of the February 10, 2009
21 Indictment, *United States of America v. Cheng Yuan Lin*, Case No. 09-cr-00131, U.S.D.C.
22 Northern District of California, located at (<http://www.justice.gov/atr/cases/f243500/243521.pdf>).

23 7. Attached hereto as Exhibit E is a true and correct copy of the May 12, 2011
24 Amended Plea Agreement, *United States of America v. Samsung SDI Company, Ltd.*, Case No. 11-
25 cr-00162, U.S.D.C. Northern District of California, located at
26 (<http://www.justice.gov/atr/cases/f272100/272150.pdf>).
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1 I declare under penalty of perjury that the foregoing is true and correct.

2 Executed this 23d day of December, 2014, in Fort Lauderdale, Florida.

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4 /s/ Stuart H. Singer _____

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